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U.S. Department of Justice

United States Attorney District of Maryland

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November 21, 2025

VIA ECF

The Honorable Lydia K. Griggsby United States District Court for the District of Maryland 6500 Cherrywood Lane, Suite 400 Greenbelt, Maryland 20770

Re: Joint Status Report - *United States v. Jason Leidel* Crim. No. LKG-22-00380

Dear Judge Griggsby:

After consultation between the parties, we write to advise the Court of the items we anticipate raising during the pretrial conference, scheduled for Monday, November 24. The parties would like to address:

- 1. Frye/Lafler hearing;
- 2. Availability of defense expert and defense intent to go forward with trial;
- 3. Motion re expert/lay testimony (ECF Nos. 199, 200);
- 4. Rule 615 on sequestration of witnesses;
- 5. Government exhibit drives;
- 6. Trial schedule (hours, any days off); and
- 7. Water at counsel table and witness stand.

There are several items that we do not anticipate needing to address on Monday. First, per the latest Government filing, there is no need to address the 404(b) motion (ECF Nos. 192, 198, 202). Second, the motion regarding a reasonable doubt instruction (ECF Nos. 193, 201) is still pending but the parties anticipate addressing that during the charging conference at the end of trial.

Of course, the parties will be happy to address any other items on the Court's agenda. Please do not hesitate to contact us with any questions or concerns.

Respectfully submitted,

Kelly O. Hayes United States Attorney

By: /s/

Kenneth Clark Chris Sarma

Assistant United States Attorneys

cc: Marc Hall, Esq. (via ECF and email)